



The Dow Chemical Company
Midland, Michigan 48674
USA

June 22, 2011

Representative Hugh D. Crawford
Michigan House of Representatives
Regulatory Reform Committee
Committee Chair

Mr. Chairman, Members of the Committee,

My name is Carrie Houtman and I represent The Dow Chemical Company, headquartered in Midland, Michigan.

Dow has been a part of Michigan's manufacturing base since its founding in 1897, and we have more than 6000 employees in Michigan today. Manufacturing has long been the largest business sector of Michigan's economy, employing more than 10% of our overall workforce. The chemical industry is an essential part of Michigan's manufacturing sector. More than 96% of all manufactured goods are directly touched by chemistry.

The Dow Chemical Company strongly supports HR 96, which urges Congress to modernize the Toxics Substances Control Act, referred to as TSCA, enacted in 1976. Improvements are needed to reflect the advancements in science and to equip EPA with updated tools and technology to implement a modernized TSCA.

A strong science-based federal program is needed to facilitate interstate commerce – avoiding individual state regulatory programs. Given that chemical management regulations have historically been developed and implemented at the federal level, the costs to establish such a program would be cost prohibitive at the state level, and a significant challenge to resource given the technical expertise needed. Further, such state-level programs increase the cost of doing business, thereby discouraging business investment. It places states at a competitive disadvantage as suppliers assess whether a local market can support added compliance costs.

House Resolution 96 outlines 10 principles for modernizing TSCA, which are aligned with elements that Dow sees as critical to enhance public safety and to support sustainable chemistry innovation.

Dow believes that a modernized TSCA should reflect the following:

- Chemicals should be safe for their intended use - which includes consideration of the effects of chemical exposure on children.
- Chemical safety is a shared responsibility between government, industry, the value chain and consumers.
- Chemical industry is responsible for ensuring that EPA has sufficient information to assess chemical safety.

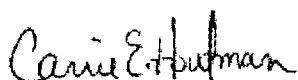
- Regulatory decisions and chemical evaluations must follow a scientific, risk-based approach.
- Federal government has the authority, accountability and resources to implement and enforce a strengthened national policy.
- Industry supports disclosure of relevant environment, health and safety information to the public.
- Technological innovation in sustainable chemistry should be encouraged, and regulations should continue to foster a chemical industry which is globally competitive.

The U.S. needs a strong and effective science-based **federal** program for ensuring that chemicals in commerce are safe for their intended uses. A strengthened program would foster marketplace and public confidence, create a level playing field among chemicals in commerce and provide certainty for business investment, while maintaining the benefits for society associated with the use of chemical products.

To ensure that Congress sees TSCA modernization as a priority, the industry needs **all stakeholders** to make their interest known. This resolution would be a clear sign of the support that exists within the state of Michigan for a strengthened chemicals management program at the federal level.

Dow would like to thank Rep. Brunner for his sponsorship of HR 96 and respectfully requests the committee to support the adoption of this resolution.

Sincerely,



Carrie Houtman

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